

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GEORGE ASSAD, Derivatively on
Behalf of FIBROGEN, INC.,

Plaintiff,

v.

ENRIQUE CONTERNO, PAT
COTRONEO, CHRISTINE CHUNG,
MARK EISNER, JAMES A.
SCHOENECK, K. PEONY YU,
SUZANNE BLAUG, AOIFE
BRENNAN, BENJAMIN F.
CRAVATT, JEFFREY L.
EDWARDS, JEFFREY W.
HENDERSON, MAYKIN HO,
THOMAS F. KEARNS JR., GERALD
LEMA, RORY B. RIGGS, and
KALEVI KURKIJÄRVI,

Individual Defendants,

-and-

FIBROGEN, INC., a Delaware
corporation,

Nominal Defendant.

Case No. 1:21-cv-01811-RGA

**STIPULATION AND [PROPOSED] ORDER OF
VOLUNTARY DISMISSAL WITHOUT PREJUDICE
PURSUANT TO FED. R. CIV. P. 41(a)(1)(A)(ii)**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff George Assad (“Plaintiff”), Individual Defendants Enrique Conterno, Pat Cotroneo,

Christine Chung, Mark Eisner, James A. Schoeneck, the Estate of Thomas B. Neff, K. Peony Yu, Suzanne Blaug, Aoife Brennan, Benjamin F. Cravatt, Jeffrey L. Edwards, Jeffrey W. Henderson, Maykin Ho, Thomas F. Kearns Jr., Gerald Lema, Rory B. Riggs, and Kalevi Kurkijärvi (“Individual Defendants”), and Nominal Defendant Fibrogen, Inc. (“FibroGen”) (collectively, “Defendants” and, with the Plaintiff, the “Parties”) hereby stipulate that this action be dismissed without prejudice as to all claims and causes of action, with each party bearing that party’s own attorney’s fees and costs.

Notice to shareholders of this stipulation of voluntary dismissal is not required under Federal Rule of Civil Procedure 23.1(c) because the dismissal is without prejudice and no compensation in any form has passed directly or indirectly from any of the Defendants to the Plaintiff or Plaintiff’s attorneys and no promise to give any such compensation has been made.

Dated: November 14, 2024

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IT IS SO ORDERED this ____ day of _____, 2024.

HON. RICHARD G. ANDREWS
UNITED STATES DISTRICT JUDGE